



November 5, 2018

Memorandum

To: Members of the Committee
From: Melissa Batchelor, Assistant Director
Through: Wendy M. Payne, Executive Director
Subj: *Rescission of Technical Release 8*¹

MEETING OBJECTIVE

The meeting objective is to review the comment letters to the exposure draft and approve the Draft Technical Release *Rescission of Technical Release 8* which only required minimal changes to the Basis for Conclusions so that it may be submitted to FASAB for their 45-day review.

BRIEFING MATERIAL

This memorandum provides the staff summary. The staff summary is intended to support your consideration of the comments and not to substitute for reading the individual letters. The summary also presents:

- A. Tally of Responses By Question.....4
- B. Quick Table of Responses By Question4

- Attachment 1** provides the full text of each comment letter
- Attachment 2** provides the original exposure draft with suggested edits
- Attachment 2** provides the clean Draft Technical Release, *Rescission of Technical Release 8*
- Attachment 4** provides the ballot

¹ The staff prepares Board meeting materials to facilitate discussion of issues at the Board meeting. This material is presented for discussion purposes only; it is not intended to reflect authoritative views of FASAB or its staff. Official positions of FASAB are determined only after extensive due process and deliberations.

STAFF SUMMARY OF RESPONSES

STAFF SUMMARY

SUMMARY OF OUTREACH EFFORTS

The exposure draft, *Rescission of Technical Release 8*, was issued August 21, 2018 with comments requested by October 5, 2018.

Upon release of the ED, FASAB provided notices and press releases to the FASAB subscription email list, the Federal Register, *FASAB News*, the *Journal of Accountancy*, Association of Government Accountants Topics, the *CPA Journal*, *Government Executive*, the *CPA Letter*, the Chief Financial Officers Council, the Council of the Inspectors General on Integrity and Efficiency, and committees of professional associations generally commenting on EDs in the past (for example, the Greater Washington Society of CPAs and the Association of Government Accountants Financial Management Standards Board).

To encourage responses, reminder notices were provided to our Listserv on September 24, 2018.

RESULTS AND ANALYSIS

As of October 19, 2018, we have received nine responses from the following sources:

	FEDERAL (Internal)	NON-FEDERAL (External)
Association/Industry Organization		1
Auditors		
Individual		1
Preparers and financial managers	7	

The full text of the comment letters is provided as Attachment 1. Attachment 1 includes a table of contents and identifies respondents in the order their responses were received. The comment letters appear as an attachment to facilitate compilation and pagination. However, staff encourages you to read the letters in their entirety before you read the staff summary below.

After considering the comments, staff notes the majority of respondents agreed with these proposals.

- **9 respondents agreed with the proposal to rescind TR 8, *Clarification of Standards Relating to Inter-Entity Costs*, because it is no longer consistent with SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, as amended.**

Staff Recommendation:

The respondents agreed with the proposal and did not offer any comments or suggestions for change. Therefore, there are no changes to the Draft Technical Release language.

STAFF SUMMARY OF RESPONSES

Staff recommends the following language in the basis for conclusions to summarize the outreach and results:

Summary of Outreach Efforts and Responses

The exposure draft (ED), *Rescission of Technical Release 8*, was issued August 21, 2018 with comments requested by October 5, 2018.

Upon release of the ED, FASAB provided notices and press releases to the FASAB subscription email list, the Federal Register, *FASAB News*, the *Journal of Accountancy*, Association of Government Accountants Topics, the *CPA Journal*, *Government Executive*, the *CPA Letter*, the Chief Financial Officers Council, the Council of the Inspectors General on Integrity and Efficiency, and committees of professional associations generally commenting on EDs in the past (for example, the Greater Washington Society of CPAs and the Association of Government Accountants Financial Management Standards Board).

The AAPC received nine responses from preparers, users of federal financial information, and professional associations. All respondents agreed with the proposals provided in the TR.

The AAPC considered responses to the ED at its November 27, 2018, public meeting. The AAPC did not rely on the number in favor of or opposed to a given position. Information about the respondents majority view is provided only as a means of summarizing the comments. The AAPC considered the arguments in each response and weighed the merits of the points raised.

All respondents supported the proposal to rescind TR 8, *Clarification of Standards Relating to Inter-Entity Costs*, because it is no longer consistent with SFFAS 4, as amended.

AAPC & Board Approval

The TR was approved by the AAPC for release to FASAB for issuance. **[TBD-The Board has reviewed this TR and a majority of its members do not object to its issuance.]** Written ballots are available for public inspection at the FASAB office.

STAFF SUMMARY OF RESPONSES

A. Tally of Responses By Question

QUESTION	AGREE	DISAGREE
1. In light of the recently issued Statement of Federal Financial Accounting Standards (SFFAS) 55, <i>Amending Inter-entity Cost Provisions</i> , this TR rescinds TR 8, <i>Clarification of Standards Relating to Inter-Entity Costs</i> , because it is no longer consistent with SFFAS 4, <i>Managerial Cost Accounting Standards and Concepts</i> , as amended. Do you agree or disagree with the rescission of TR 8? Please provide the rationale for your answer.	9	0

B. Quick Table of Responses By Question (A= Agrees NC=No additional issues or comments RNAD=Respondent Neither agreed nor Disagreed)

<u>Respondent</u>	<u>QUESTION</u> Do you agree or disagree with the rescission of TR 8? Please provide the rationale for your answer.
#1 Rahman	A
#2 DOC	A
#3 GWSCPA	A
#4 SSA	A
#5 HUD	A
#6 DHS	A
#7 VA	A
#8 DoD	A
#9 OGA	A

Attachment 1- Comment Letters

Table of Contents

Comment Letter	Respondent	page
#1	Hafizur Rahman	1
#2	Department of Commerce	2
#3	Greater Washington Society of CPAs	3
#4	Social Security Administration	4
#5	Department of Housing and Urban Development	5
#6	Department of Homeland Security	6
#7	Department of Veterans Affairs	7
#8	Department of Defense	8
#9	OGA	9

From: Rahman, Hafizur (CTR) [mailto:Hafizur.Rahman@tsa.dhs.gov]
Sent: Wednesday, August 22, 2018 1:54 PM
To: FASAB
Subject: AAPC Exposure Draft - Technical Release: Rescission of Technical Release 8

Please select the type(s) of organization responding to this exposure draft. If you are not responding on behalf of an organization, please select "individual."

Accounting Firm
Federal Entity (user)
Federal Entity (preparer)
Federal Entity (auditor)
Federal Entity (other) If other, please specify:
Association/Industry Organization
Nonprofit organization/Foundation
Other If other, please specify:
Individual

Please provide your name.

Name: Hafizur Rahman, CGFM, CPA

Please identify your organization, if applicable.

Organization: Sub-Contractor Consultant of Miracle Systems, LLC to TSA\FMD\PPE&E

Your responses should be sent to fasab@fasab.gov. If you are unable to respond by email, please fax your responses to 202-512-7366.

Q1. In light of the recently issued Statement of Federal Financial Accounting Standards (SFFAS) 55, Amending Inter-entity Cost Provisions, this TR rescinds TR 8, Clarification of Standards Relating to Inter-Entity Costs, because it is no longer consistent with SFFAS 4, Managerial Cost Accounting Standards and Concepts, as amended.

Do you agree or disagree with the rescission of TR 8? Please provide the rationale for your answer.

I do agree.

Rationale: The justifications provided in the "Project History" itemized under A.1 through A.13 are logical, explain detail perspectives (historical as well as current) consistent with standard setting practices and refinement of conceptual development.

AAPC Exposure Draft - Technical Release: *Rescission of Technical Release 8*

Question for Respondents due October 5, 2018

Please select the type(s) of organization responding to this exposure draft. If you are not responding on behalf of an organization, please select "individual."

Accounting Firm	<input type="checkbox"/>	
Federal Entity (user)	<input type="checkbox"/>	
Federal Entity (preparer)	<input checked="" type="checkbox"/>	
Federal Entity (auditor)	<input type="checkbox"/>	
Federal Entity (other)	<input type="checkbox"/>	If other, please specify: <input type="text"/>
Association/Industry Organization	<input type="checkbox"/>	
Nonprofit organization/Foundation	<input type="checkbox"/>	
Other	<input type="checkbox"/>	If other, please specify: <input type="text"/>
Individual	<input type="checkbox"/>	

Please provide your name.

Name:

Please identify your organization, if applicable.

Organization:

Your responses should be sent to fasab@fasab.gov. If you are unable to respond by email, please fax your responses to 202-512-7366.

Q1. In light of the recently issued Statement of Federal Financial Accounting Standards (SFFAS) 55, *Amending Inter-entity Cost Provisions*, this TR rescinds TR 8, *Clarification of Standards Relating to Inter-Entity Costs*, because it is no longer consistent with SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, as amended.

Do you agree or disagree with the rescission of TR 8? Please provide the rationale for your answer.

The Department of Commerce agrees with the rescission of TR 8. The justification provided in the proposed Technical Guidance is logical and supported by the project history in Appendix A of the TR.



September 26, 2018

Wendy Payne, Executive Director
Federal Accounting Standards Advisory Board
Mail Stop 6K17V
441 G Street, NW – Suite 6814
Washington, DC 20548

Dear Ms. Payne:

The Greater Washington Society of Certified Public Accountants (GWSCPA) Federal Issues and Standards Committee (FISC) appreciates the opportunity to provide comments on the Federal Accounting Standards Advisory Board (FASAB) Accounting and Auditing Policy Committee's (AAPC) Exposure Draft (ED) on the Federal Financial Accounting Technical Release (TR), *Rescission of Technical Release 8*.

The GWSCPA consists of approximately 3,300 members, and the FISC includes nearly 30 GWSCPA members who are active in financial management, accounting, and auditing in the Federal sector. We sincerely appreciate the opportunity by the Board to share our views. Our response to the ED question is included below.

Q1. In light of the recently issued Statement of Federal Financial Accounting Standards (SFFAS) 55, *Amending Inter-entity Cost Provisions*, this TR rescinds TR 8, *Clarification of Standards Relating to Inter-Entity Costs*, because it is no longer consistent with SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, as amended.

Do you agree or disagree with the rescission of TR 8? Please provide the rationale for your answer.

A1. The FISC agrees with the rescission of TR 8 for the reasons stated in the ED.

This comment letter was reviewed by the members of FISC, and represents the consensus views of our members.

Very truly yours,



Sherif R. Ettefa
FISC Chair

AAPC Exposure Draft - Technical Release: *Rescission of Technical Release 8*

Question for Respondents due October 5, 2018

Please select the type(s) of organization responding to this exposure draft. If you are not responding on behalf of an organization, please select "individual."

Accounting Firm	<input type="checkbox"/>	
Federal Entity (user)	<input type="checkbox"/>	
Federal Entity (preparer)	<input checked="" type="checkbox"/>	
Federal Entity (auditor)	<input type="checkbox"/>	
Federal Entity (other)	<input type="checkbox"/>	If other, please specify: <input type="text"/>
Association/Industry Organization	<input type="checkbox"/>	
Nonprofit organization/Foundation	<input type="checkbox"/>	
Other	<input type="checkbox"/>	If other, please specify: <input type="text"/>
Individual	<input type="checkbox"/>	

Please provide your name.

Name: Joanne Gasparini, Deputy Associate Commissioner for Office of Financial Policy and Operations

Please identify your organization, if applicable.

Organization: Social Security Administration (SSA)

Your responses should be sent to fasab@fasab.gov. If you are unable to respond by email, please fax your responses to 202-512-7366.

Q1. In light of the recently issued Statement of Federal Financial Accounting Standards (SFFAS) 55, *Amending Inter-entity Cost Provisions*, this TR rescinds TR 8, *Clarification of Standards Relating to Inter-Entity Costs*, because it is no longer consistent with SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, as amended.

Do you agree or disagree with the rescission of TR 8? Please provide the rationale for your answer.

SSA Response: We agree with the rescission of Technical Release 8, as it is no longer consistent with SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, as amended. Technical Release 8 is inconsistent with current generally accepted accounting principles and could result in potential misapplication of technical guidance, if not rescinded.

AAPC Exposure Draft - Technical Release: Rescission of Technical Release 8

Question for Respondents due October 5, 2018

Please select the type(s) of organization responding to this exposure draft. If you are not responding on behalf of an organization, please select "individual."

Accounting Firm	<input type="checkbox"/>	
Federal Entity (user)	<input type="checkbox"/>	
Federal Entity (preparer)	<input type="checkbox"/>	
Federal Entity (auditor)	<input type="checkbox"/>	
Federal Entity (other)	<input checked="" type="checkbox"/>	If other, please specify: <input type="text" value="Department of Housing and Urban Development"/>
Association/Industry Organization	<input type="checkbox"/>	
Nonprofit organization/Foundation	<input type="checkbox"/>	
Other	<input type="checkbox"/>	If other, please specify: <input type="text"/>
Individual	<input type="checkbox"/>	

Please provide your name.

Name:

Please identify your organization, if applicable.

Organization:

Your responses should be sent to fasab@fasab.gov. If you are unable to respond by email, please fax your responses to 202-512-7366.

Q1. In light of the recently issued Statement of Federal Financial Accounting Standards (SFFAS) 55, *Amending Inter-entity Cost Provisions*, this TR rescinds TR 8, *Clarification of Standards Relating to Inter-Entity Costs*, because it is no longer consistent with SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, as amended.

Do you agree or disagree with the rescission of TR 8? Please provide the rationale for your answer.

The Department of Housing and Urban Development, including the Federal Housing Administration and the Government Nation Mortgage Association, agrees with the rescission of TR 8. The rationale for HUD’s answer is that, when the promulgation of a new standard creates discrepancies between that standard and an existing technical release, it is imperative that any potential inconsistencies be eliminated by rescinding the technical release.

As per Appendix A of this Exposure Draft, “SFFAS 55, *Amending Inter-entity Cost Provisions*, amended SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, and rescinded SFFAS 30, *Inter-Entity Cost Implementation: Amending SFFAS 4, Managerial Cost Accounting Standards and Concepts...*” The original Technical Release 8 (TR8) centered on providing additional or clarifying guidance on several aspects of full costing specified in SFFAS 4 to the Federal community, but, with the issuance of

AAPC Exposure Draft - Technical Release: *Rescission of Technical Release 8***Question for Respondents due October 5, 2018**

SFFAS 55 and rescinding of SFFAS 30, has been made either inconsistent or duplicative to information provided in SFFAS 4 and, therefore, should be rescinded.

Examples:

1. TR 8, as currently written, does not make accurate distinction between business and non-business type activities, thus creating the risk of misapplication of technical guidance as recognition of inter-entity costs for non-business type activities (with a few exceptions including personnel and treasury judgement fund) is rescinded by SFFAS 55.
2. TR 8, as currently written, includes references to rescinded standards and guidance which creates the risk of misapplication of technical guidance.
3. Portions of TR 8 reiterated key points from SFFAS 4 and in some instances, quoted it directly. Currently, with the updates from the issuances of Standard 55, necessary guidance resides in SFFAS 4 as amended. Redundancy of TR 8 guidance includes:
 - a. Guidance on the directness of the relationship to the entity's operations as used in determining if a transaction should be considered material to the receiving entity; and
 - b. Guidance on identifiability as used in determining if a transaction should be considered material to the receiving entity.

AAPC Exposure Draft - Technical Release: *Rescission of Technical Release 8*

Question for Respondents due October 5, 2018

Please select the type(s) of organization responding to this exposure draft. If you are not responding on behalf of an organization, please select "individual."

Accounting Firm	<input type="checkbox"/>	
Federal Entity (user)	<input checked="" type="checkbox"/>	
Federal Entity (preparer)	<input checked="" type="checkbox"/>	
Federal Entity (auditor)	<input type="checkbox"/>	
Federal Entity (other)	<input type="checkbox"/>	If other, please specify: <input type="text"/>
Association/Industry Organization	<input type="checkbox"/>	
Nonprofit organization/Foundation	<input type="checkbox"/>	
Other	<input type="checkbox"/>	If other, please specify: <input type="text"/>
Individual	<input type="checkbox"/>	

Please provide your name.

Name:

Please identify your organization, if applicable.

Organization:

Your responses should be sent to fasab@fasab.gov. If you are unable to respond by email, please fax your responses to 202-512-7366.

Q1. In light of the recently issued Statement of Federal Financial Accounting Standards (SFFAS) 55, *Amending Inter-entity Cost Provisions*, this TR rescinds TR 8, *Clarification of Standards Relating to Inter-Entity Costs*, because it is no longer consistent with SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, as amended.

Do you agree or disagree with the rescission of TR 8? Please provide the rationale for your answer.

DHS Response: DHS agrees with the rescission of TR 8 because it is no longer consistent with SFFAS 4 and the rescission of TR8 removes this area of misunderstanding relating to Inter-Entity Costs.

AAPC Exposure Draft - Technical Release: *Rescission of Technical Release 8*

Question for Respondents due October 5, 2018

Please select the type(s) of organization responding to this exposure draft. If you are not responding on behalf of an organization, please select “individual.”

Accounting Firm	<input type="checkbox"/>	
Federal Entity (user)	<input type="checkbox"/>	
Federal Entity (preparer)	<input checked="" type="checkbox"/>	
Federal Entity (auditor)	<input type="checkbox"/>	
Federal Entity (other)	<input type="checkbox"/>	If other, please specify: <input type="text"/>
Association/Industry Organization	<input type="checkbox"/>	
Nonprofit organization/Foundation	<input type="checkbox"/>	
Other	<input type="checkbox"/>	If other, please specify: <input type="text"/>
Individual	<input type="checkbox"/>	

Please provide your name.

Name:

Please identify your organization, if applicable.

Organization:

Your responses should be sent to fasab@fasab.gov. If you are unable to respond by email, please fax your responses to 202-512-7366.

Q1. In light of the recently issued Statement of Federal Financial Accounting Standards (SFFAS) 55, *Amending Inter-entity Cost Provisions*, this TR rescinds TR 8, *Clarification of Standards Relating to Inter-Entity Costs*, because it is no longer consistent with SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, as amended.

Do you agree or disagree with the rescission of TR 8? Please provide the rationale for your answer.

VA – Concur with the rescission of Technical Release 8, Classification of Standards Relating to Inter-Entity Costs. Due to the issuance of SFFAS 55, it is necessary to rescind TR 8.

From: Laurance, Kim R SES OSD OUSD C (US) [mailto:kim.r.laurance.civ@mail.mil]
Sent: Thursday, October 04, 2018 2:51 PM
To: Payne, Wendolyn M
Cc: Kadiri, Mobola A SES OSD OUSD C (US); Easton, Mark E SES OSD OUSD C (US)
Subject: Rescission of Technical Release 8

Wendy,

Thank you for the opportunity to review and provide feedback.

The Department of Defense agrees with the rescission of TR 8.

Thanks,
Kim Laurance
Director, Accounting & Finance Policy
1100 Defense Pentagon, Suite 3D150, Arlington, Virginia 20301-1100
Office: 1+703-571-1397
Kim.r.laurance.civ@mail.mil <http://comptroller.defense.gov>
Leadership. Excellence. Stewardship.

UNCLASSIFIED

FASAB EXPOSURE DRAFT
Rescission of Technical Release 8
Due Date: 5 October 2018

Please update Header and Footer to Classify as Appropriate

<i>Comment #</i>	<i>Page #</i>	<i>Line #</i>	<i>Section #</i>	<i>Agency</i>	<i>Comment Type</i>	<i>Comments</i>	<i>Rationale</i>
					Indicate (S) for Substantive or (A) for Administrative		
1	Q1			OGA	A	OGA agrees with the rescission of TR 8 in response to FASAB Question 1.	OGA has reviewed the Board's rationale for rescinding TR 8 and supports its decision. OGA concurs that the guidance and clarifications included in TR 8 are no longer needed as they are either: (a) broadly adopted and understood; or (b) specifically addressed in the SFFAS 4 (as revised). Further, the OGA applauds FASAB's diligence in reviewing and streamlining its authoritative guidance set. Eliminating duplicative and/or unnecessary guidance and related materials assists users in navigating these complex materials and gaining clarity over accounting standards.

UNCLASSIFIED



Federal Accounting Standards Advisory Board

RESCISSION OF TECHNICAL RELEASE 8

Federal Financial Accounting Technical Release [19](#)

[February 20, 2019](#)

Comment [MB1]: Typical marked changes to convert an exposure draft to a final document have been accepted in this document. Examples include removing the questions for respondents and term exposure draft from cover

Deleted: August 21, 2018

Comment [MB2]: 45 days for FASAB review with next Board meeting

THE FEDERAL ACCOUNTING STANDARDS ADVISORY BOARD

The Secretary of the Treasury, the Director of the Office of Management and Budget (OMB), and the Comptroller General of the United States established the Federal Accounting Standards Advisory Board (FASAB or "the Board") in October 1990. FASAB is responsible for promulgating accounting standards for the United States government. These standards are recognized as generally accepted accounting principles (GAAP) for the federal government.

An accounting standard is typically formulated initially as a proposal after considering the financial and budgetary information needs of citizens (including the news media, state and local legislators, analysts from private firms, academe, and elsewhere), Congress, federal executives, federal program managers, and other users of federal financial information. The proposed standards are published in an exposure draft for public comment. In some cases, a discussion memorandum, invitation for comment, or preliminary views document may be published before an exposure draft is published on a specific topic. A public hearing is sometimes held to receive oral comments in addition to written comments. The Board considers comments and decides whether to adopt the proposed standard with or without modification. After review by the three officials who sponsor FASAB, the Board publishes adopted standards in a Statement of Federal Financial Accounting Standards. The Board follows a similar process for Statements of Federal Financial Accounting Concepts, which guide the Board in developing accounting standards and formulating the framework for federal accounting and reporting.

Additional background information is available from FASAB or its website:

- ["Memorandum of Understanding among the Government Accountability Office, the Department of the Treasury, and the Office of Management and Budget, on Federal Government Accounting Standards and a Federal Accounting Standards Advisory Board"](#)
- ["Mission Statement: Federal Accounting Standards Advisory Board," exposure drafts, Statements of Federal Financial Accounting Standards and Concepts, FASAB newsletters,](#) and other items of interest are posted on FASAB's website at www.fasab.gov.

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Contact us:

Federal Accounting Standards Advisory Board
441 G Street, NW, Suite 1155
Washington, D.C. 20548
Telephone 202-512-7350
Fax 202-512-7366
www.fasab.gov

The Accounting and Auditing Policy Committee

The Accounting and Auditing Policy Committee (AAPC) was organized in May 1997 by the Department of the Treasury, the Office of Management and Budget (OMB), the Government Accountability Office (GAO), the Chief Financial Officers Council (CFOC), and the Council of the Inspectors General on Integrity and Efficiency (CIGIE—formally the President's Council on Integrity and Efficiency) as a body to research accounting and auditing issues requiring guidance.

The AAPC serves as a permanent committee established by the Federal Accounting Standards Advisory Board (FASAB). FASAB's mission is to develop accounting standards after considering the financial and budgetary information needs of congressional oversight groups, executive agencies, and the needs of other users of federal financial information. The mission of the AAPC is to assist the federal government in improving financial reporting through the timely identification, discussion, and recommendation of solutions to accounting and auditing issues as they relate to the specific application of existing authoritative literature.

The AAPC is intended to address issues that arise in implementation that are not specifically or fully discussed in federal accounting and auditing standards. The AAPC's guidance is cleared by FASAB before being published.

Additional background information on the AAPC is available from FASAB on its website:

- ◆ [“Charter of the Accounting and Auditing Policy Committee”](#)
- ◆ [Accounting and Auditing Policy Committee Operating Procedures](#)

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SUMMARY

Statement of Federal Financial Accounting Standards (SFFAS) 55, *Amending Inter-entity Cost Provisions*, amended SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, and rescinded SFFAS 30, *Inter-Entity Cost Implementation: Amending SFFAS 4, Managerial Cost Accounting Standards and Concepts*, and Interpretation 6, *Accounting for Imputed Intra-departmental Costs: An Interpretation of SFFAS No. 4*.

As a result, Technical Release (TR) 8, *Clarification of Standards Relating to Inter-Entity Costs*, is no longer consistent with SFFAS 4, as amended, because the requirement to recognize inter-entity costs was revised significantly.

This TR rescinds TR 8 because it is no longer consistent with SFFAS 4, as amended.

The provisions of this TR need not be applied to immaterial items. The determination of whether an item is material depends on the degree to which omitting or misstating information about the item makes it probable that the judgment of a reasonable person relying on the information would have been changed or influenced by the omission or the misstatement.

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Deleted: SFFAS 4, as amended, provides for the continued recognition of significant inter-entity costs by business-type activities. Although recognition of inter-entity costs by activities that are not business-type activities is no longer required with the exception of inter-entity costs for personnel benefits and the Treasury Judgment Fund settlements unless otherwise directed by OMB, non-business-type activities may elect to recognize imputed cost and corresponding imputed financing for other types of inter-entity costs.¶

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Deleted: Project history . 4¶
Rescission of TR 8, *Clarification of Standards Relating to Inter-Entity Costs* . 5¶

TECHNICAL GUIDANCE

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SCOPE

1. Readers of this Technical Release (TR) should first refer to the hierarchy of accounting standards in Statement of Federal Financial Accounting Standards (SFFAS) 34, *The Hierarchy of Generally Accepted Accounting Principles, Including the Application of Standards Issued by the Financial Accounting Standards Board*. This TR supplements the relevant accounting standards but is not a substitute for and does not take precedence over the standards.

RESCISSION OF TECHNICAL RELEASE 8, *CLARIFICATION OF STANDARDS RELATING TO INTER-ENTITY COSTS*

2. This paragraph rescinds TR 8, *Clarification of Standards Relating to Inter-Entity Costs*, in its entirety because it is no longer consistent with SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, as amended.

EFFECTIVE DATE

3. This TR is effective upon issuance.

The provisions of this Technical Release need not be applied to immaterial items.

APPENDIX A: BASIS FOR CONCLUSIONS

This appendix discusses some factors considered significant by Committee members in reaching the conclusions in this Technical Release. It includes the reasons for accepting certain approaches and rejecting others. Individual members gave greater weight to some factors than to others. The guidance enunciated in this Technical Release—not the material in this appendix—should govern the accounting for specific transactions, events, or conditions.

This Technical Release may be affected by later Statements or other pronouncements. The Handbook is updated annually and includes a status section directing the reader to any pronouncement that changed this Technical Release. Within the text of the Technical Release, the guidance sections are updated for changes. However, this appendix will not be updated to reflect future changes. The reader can review the basis for conclusions of the amending Statements or other pronouncements for the rationale for each amendment.

PROJECT HISTORY

- A1. SFFAS 4, (including Interpretation 6, *Accounting for Imputed Intra-departmental Costs: An Interpretation of SFFAS No. 4*), required reporting entities to recognize the full costs of services received from other federal reporting entities even if there was no requirement to reimburse the providing reporting entity for the full cost of such services.
- A2. The Federal Accounting Standards Advisory Board (FASAB) issued SFFAS 55, *Amending Inter-entity Cost Provisions*, on May 31, 2018. This Statement amended SFFAS 4 and rescinded SFFAS 30, *Inter-Entity Cost Implementation: Amending SFFAS 4, Managerial Cost Accounting Standards and Concepts*, and Interpretation 6.
- A3. With the rescission of SFFAS 30, paragraphs 110 and 111 of SFFAS 4, as amended, were restored to their original language prior to the issuance of SFFAS 30. SFFAS 55 revised SFFAS 4 to provide for the continued recognition of significant inter-entity costs by business-type activities. Inter-entity costs continue to be imputed for those reporting entities conducting business-type activities¹ because the information is directly tied to rates.
- A4. Per SFFAS 4, as amended, recognition of inter-entity costs by activities that are not business-type activities is not required with the exception of inter-entity costs for personnel benefits and the Treasury Judgment Fund settlements unless otherwise directed by the Office of Management and Budget (OMB). Notwithstanding the absence of a requirement, non-business-type activities may elect to recognize imputed cost and corresponding imputed financing for other types of inter-entity costs.

Deleted: , *Managerial Cost Accounting Standards and Concepts*

Deleted: was issued

¹ Business-type activity is defined as a significantly self-sustaining activity that finances its continuing cycle of operations through collection of exchange revenue as defined in SFFAS 7, *Accounting for Revenue and Other Financing Sources and Concepts for Reconciling Budgetary and Financial Accounting*.

RESCISSION OF TR 8, CLARIFICATION OF STANDARDS RELATING TO INTER-ENTITY COSTS

- A5. This TR rescinds TR 8 because it is no longer consistent with SFFAS 4, as amended.
- A6. Rescinding TR 8 rescinds guidance that is not in accordance with generally accepted accounting principles (GAAP) due to SFFAS 55 amendments. For example, TR 8 does not reflect that recognition of inter-entity costs by activities that are not business-type activities is not required with the exception of inter-entity costs for personnel benefits and the Treasury Judgment Fund settlements unless otherwise directed by OMB. However, non-business-type activities may elect to recognize imputed cost and corresponding imputed financing for other types of inter-entity costs.
- A7. This TR also eliminates potentially confusing references to the rescinded SFFAS 30. The Accounting and Auditing Policy Committee (AAPC or “the Committee”) believes it appropriate to rescind TR 8 because allowing it to remain is inconsistent with current GAAP and may lead to potential misapplication of the technical guidance. For example, paragraph 7 (the first paragraph under the “Technical Guidance” section) of TR 8 states: “This guidance is presented in response to three implementation issues identified by FASAB based on comments SFFAS 30 received from respondents.” With SFFAS 30 being rescinded, allowing TR 8 to remain in effect could bring questions as to its applicability.
- A8. Considering the changes that have occurred in the accounting for inter-entity costs, the Committee’s goal was to update TR 8 to ensure clear guidance going forward. The Committee carefully considered if any guidance should be maintained and if any additional guidance was necessary. Paragraph 111 of SFFAS 4, as amended, states:
- Recognition of all significant inter-entity costs is important when those costs constitute inputs to government goods or services provided for a fee or user charge. Generally, the fees and user charges should recover the full costs of those goods and services.^[Footnote 33 omitted] Thus, the cost of inter-entity goods or services needs to be recognized by the receiving entity in order to determine fees or user charges for goods and services sold by the federal government. Recognition of inter-entity costs supporting business-type activities^[Footnote 33A omitted] and recognition of inter-entity costs for non-business type activities that elect to do so should be made in accordance with implementation guidance provided by FASAB through one or more Technical Releases.^{33B} Activities that are not business-type activities are not required to recognize inter-entity costs other than inter-entity costs for personnel benefits and the Treasury Judgment Fund settlements unless otherwise directed by OMB. Notwithstanding the absence of a requirement, non-business-type activities may elect to recognize imputed cost and corresponding imputed financing for other types of inter-entity costs.
- ^{33B} Technical Release (TR) 8, *Clarification of Standards Relating to Inter-Entity Costs* provides implementation guidance. Additional TRs may be provided by FASAB if needed.
- A9. The Committee believes that much of the guidance that was previously included in TR 8 is no longer necessary or relevant based on the amended standards. The purpose of TR 8 was to provide guidance in response to concerns raised during due process of SFFAS 30. TR 8 addresses three aspects of full costing specified in SFFAS 4: (1) guidance on

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costs that should be considered broad and general for all entities, (2) guidance on the directness of the relationship to the entity's operations as used in determining if a transaction should be considered material to the receiving entity, and (3) guidance on identifiability as used in determining if a transaction should be considered material to the receiving entity.

A10. The Committee determined that the list of broad and general support goods and services that was provided in table 1 of TR 8 is not necessary to maintain. While the list was helpful to the community when TR 8 was issued in 2008, the Committee believes the conclusions presented in the list are now well established and do not need to be included in any form of updated guidance. Table 1 provided the following examples, which appear to be widely understood in the community today as broad and general support goods and services:

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- a. Department of the Treasury services, such as disbursing electronic funds transfer and check payments, government-wide accounting and reporting policy and guidance, collection services, and trust fund maintenance
- b. Department of Justice services, such as debt collection activities and non-reimbursed services for criminal and civil litigation
- c. General Services Administration services, such as real and personal property disposal and central management functions
- d. Department of Labor services, such as administration of unemployment compensation and non-reimbursable administration and support services for the Federal Employees Compensation Account
- e. Office of Personnel Management services, such as administration of the Federal Employees Benefit Program (including pensions and post-retirement benefits)
- f. Executive Office of the President, including all support functions performed
- g. Government Accountability Office, such as accounting and auditing policy and guidance

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A11. When considering the need for guidance on the directness of a relationship to an entity's operations, TR 8 included specific excerpts from respondents to SFFAS 30, which has now been rescinded. In addition, the guidance included excerpts from SFFAS 4 as well as paraphrases from the "Managerial Cost Accounting Concepts" and "Basis for Conclusions" sections that reiterated key points. While important, the Committee determined the following TR 8 topics discussed key points that reside in SFFAS 4, as amended, and do not need to be included in any form of updated guidance:

- a. The directness of the relationship to entity operations is generally determined by matching goods or services received to the output of the entity.
- b. Managerial cost accounting should be performed to measure and report the costs of each responsibility segment level's output.
- c. The needs of the users of cost information must be taken into account.

A12. The Committee found that the majority of the explanations on identifiability included direct excerpts and paraphrases from the "Managerial Cost Accounting Concepts" and

“Basis for Conclusions” sections from SFFAS 4. The guidance in TR 8 related to the requirement for the provider to supply the receiving entity with information on the full cost of non-reimbursed or under-reimbursed inter-entity goods and services. The Committee believes this requirement and the requirements when information is not provided are well understood by the community. Therefore, this does not need to be included in any form of updated guidance.

A13. In summary, the Committee believes that, while the guidance was useful during initial implementation of SFFAS 30, it is not necessary today. Much of the guidance provided in TR 8 is now understood by the community. Further, portions of TR 8 reiterated key points from SFFAS 4 and quoted it directly. Other portions of TR 8 contained paraphrases from the “Managerial Cost Accounting Concepts” and “Basis for Conclusions” sections of SFFAS 4 that are still included within SFFAS 4. For example, including excerpts from SFFAS 4 (issued in 1995) is not practical or useful considering SFFAS 4 is available for reference. The Committee believes all necessary guidance resides in SFFAS 4, as amended.

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SUMMARY OF OUTREACH EFFORTS AND RESPONSES

A14. The exposure draft (ED), *Rescission of Technical Release 8*, was issued August 21, 2018, with comments requested by October 5, 2018.

A15. Upon release of the ED, FASAB provided notices and press releases to the FASAB subscription email list, the Federal Register, FASAB News, the *Journal of Accountancy*, Association of Government Accountants Topics, the *CPA Journal*, *Government Executive*, the *CPA Letter*, the Chief Financial Officers Council, the Council of the Inspectors General on Integrity and Efficiency, and committees of professional associations generally commenting on EDs in the past (for example, the Greater Washington Society of CPAs and the Association of Government Accountants Financial Management Standards Board).

A16. The AAPC received nine responses from preparers, users of federal financial information, and professional associations. All respondents agreed with the proposals provided in the TR.

A17. The AAPC considered responses to the ED at its November 27, 2018, public meeting. The AAPC did not rely on the number in favor of or opposed to a given position. Information about the respondents’ majority view is provided only as a means of summarizing the comments. The AAPC considered the arguments in each response and weighed the merits of the points raised.

A18. All respondents supported the proposal to rescind TR 8, *Clarification of Standards Relating to Inter-Entity Costs*, because it is no longer consistent with SFFAS 4, as amended.

AAPC & BOARD APPROVAL

A19. The TR was approved by the AAPC for release to FASAB for issuance. **[TBD-The Board has reviewed this TR and a majority of its members do not object to its issuance.]** Written ballots are available for public inspection at the FASAB office.

APPENDIX B: ABBREVIATIONS

AAPC	Accounting and Auditing Policy Committee
<u>ED</u>	<u>Exposure Draft</u>
FASAB	Federal Accounting Standards Advisory Board
GAAP	Generally Accepted Accounting Principles
OMB	Office of Management and Budget
SFFAS	Statement of Federal Financial Accounting Standards
TR	Technical Release

FASAB Members

D. Scott Showalter, Chair,

R. Scott Bell

Gila J. Bronner

Robert F. Dacey

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Federal Accounting Standards Advisory Board

RESCISSION OF TECHNICAL RELEASE 8

Federal Financial Accounting Technical Release 19

February 20, 2019

THE FEDERAL ACCOUNTING STANDARDS ADVISORY BOARD

The Secretary of the Treasury, the Director of the Office of Management and Budget (OMB), and the Comptroller General of the United States established the Federal Accounting Standards Advisory Board (FASAB or “the Board”) in October 1990. FASAB is responsible for promulgating accounting standards for the United States government. These standards are recognized as generally accepted accounting principles (GAAP) for the federal government.

An accounting standard is typically formulated initially as a proposal after considering the financial and budgetary information needs of citizens (including the news media, state and local legislators, analysts from private firms, academe, and elsewhere), Congress, federal executives, federal program managers, and other users of federal financial information. The proposed standards are published in an exposure draft for public comment. In some cases, a discussion memorandum, invitation for comment, or preliminary views document may be published before an exposure draft is published on a specific topic. A public hearing is sometimes held to receive oral comments in addition to written comments. The Board considers comments and decides whether to adopt the proposed standard with or without modification. After review by the three officials who sponsor FASAB, the Board publishes adopted standards in a Statement of Federal Financial Accounting Standards. The Board follows a similar process for Statements of Federal Financial Accounting Concepts, which guide the Board in developing accounting standards and formulating the framework for federal accounting and reporting.

Additional background information is available from FASAB or its website:

- [“Memorandum of Understanding among the Government Accountability Office, the Department of the Treasury, and the Office of Management and Budget, on Federal Government Accounting Standards and a Federal Accounting Standards Advisory Board”](#)
- [“Mission Statement: Federal Accounting Standards Advisory Board,” exposure drafts, Statements of Federal Financial Accounting Standards and Concepts, FASAB newsletters](#), and other items of interest are posted on FASAB’s website at www.fasab.gov.

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The Accounting and Auditing Policy Committee

The Accounting and Auditing Policy Committee (AAPC) was organized in May 1997 by the Department of the Treasury, the Office of Management and Budget (OMB), the Government Accountability Office (GAO), the Chief Financial Officers Council (CFOC), and the Council of the Inspectors General on Integrity and Efficiency (CIGIE—formally the President's Council on Integrity and Efficiency) as a body to research accounting and auditing issues requiring guidance.

The AAPC serves as a permanent committee established by the Federal Accounting Standards Advisory Board (FASAB). FASAB's mission is to develop accounting standards after considering the financial and budgetary information needs of congressional oversight groups, executive agencies, and the needs of other users of federal financial information. The mission of the AAPC is to assist the federal government in improving financial reporting through the timely identification, discussion, and recommendation of solutions to accounting and auditing issues as they relate to the specific application of existing authoritative literature.

The AAPC is intended to address issues that arise in implementation that are not specifically or fully discussed in federal accounting and auditing standards. The AAPC's guidance is cleared by FASAB before being published.

Additional background information on the AAPC is available from FASAB on its website:

- ◆ [“Charter of the Accounting and Auditing Policy Committee”](#)
- ◆ [Accounting and Auditing Policy Committee Operating Procedures](#)

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SUMMARY

Statement of Federal Financial Accounting Standards (SFFAS) 55, *Amending Inter-entity Cost Provisions*, amended SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, and rescinded SFFAS 30, *Inter-Entity Cost Implementation: Amending SFFAS 4, Managerial Cost Accounting Standards and Concepts*, and Interpretation 6, *Accounting for Imputed Intra-departmental Costs: An Interpretation of SFFAS No. 4*.

As a result, Technical Release (TR) 8, *Clarification of Standards Relating to Inter-Entity Costs*, is no longer consistent with SFFAS 4, as amended, because the requirement to recognize inter-entity costs was revised significantly.

This TR rescinds TR 8 because it is no longer consistent with SFFAS 4, as amended.

The provisions of this TR need not be applied to immaterial items. The determination of whether an item is material depends on the degree to which omitting or misstating information about the item makes it probable that the judgment of a reasonable person relying on the information would have been changed or influenced by the omission or the misstatement.

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TECHNICAL GUIDANCE

SCOPE

1. Readers of this Technical Release (TR) should first refer to the hierarchy of accounting standards in Statement of Federal Financial Accounting Standards (SFFAS) 34, *The Hierarchy of Generally Accepted Accounting Principles, Including the Application of Standards Issued by the Financial Accounting Standards Board*. This TR supplements the relevant accounting standards but is not a substitute for and does not take precedence over the standards.

RESCISSION OF TECHNICAL RELEASE 8, *CLARIFICATION OF STANDARDS RELATING TO INTER-ENTITY COSTS*

2. This paragraph rescinds TR 8, *Clarification of Standards Relating to Inter-Entity Costs*, in its entirety because it is no longer consistent with SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, as amended.

EFFECTIVE DATE

3. This TR is effective upon issuance.

The provisions of this Technical Release need not be applied to immaterial items.

APPENDIX A: BASIS FOR CONCLUSIONS

This appendix discusses some factors considered significant by Committee members in reaching the conclusions in this Technical Release. It includes the reasons for accepting certain approaches and rejecting others. Individual members gave greater weight to some factors than to others. The guidance enunciated in this Technical Release—not the material in this appendix—should govern the accounting for specific transactions, events, or conditions.

This Technical Release may be affected by later Statements or other pronouncements. The Handbook is updated annually and includes a status section directing the reader to any pronouncement that changed this Technical Release. Within the text of the Technical Release, the guidance sections are updated for changes. However, this appendix will not be updated to reflect future changes. The reader can review the basis for conclusions of the amending Statements or other pronouncements for the rationale for each amendment.

PROJECT HISTORY

- A1. SFFAS 4 (including Interpretation 6, *Accounting for Imputed Intra-departmental Costs: An Interpretation of SFFAS No. 4*), required reporting entities to recognize the full costs of services received from other federal reporting entities even if there was no requirement to reimburse the providing reporting entity for the full cost of such services.
- A2. The Federal Accounting Standards Advisory Board (FASAB) issued SFFAS 55, *Amending Inter-entity Cost Provisions*, on May 31, 2018. This Statement amended SFFAS 4 and rescinded SFFAS 30, *Inter-Entity Cost Implementation: Amending SFFAS 4, Managerial Cost Accounting Standards and Concepts*, and Interpretation 6.
- A3. With the rescission of SFFAS 30, paragraphs 110 and 111 of SFFAS 4, as amended, were restored to their original language prior to the issuance of SFFAS 30. SFFAS 55 revised SFFAS 4 to provide for the continued recognition of significant inter-entity costs by business-type activities. Inter-entity costs continue to be imputed for those reporting entities conducting business-type activities¹ because the information is directly tied to rates.
- A4. Per SFFAS 4, as amended, recognition of inter-entity costs by activities that are not business-type activities is not required with the exception of inter-entity costs for personnel benefits and the Treasury Judgment Fund settlements unless otherwise directed by the Office of Management and Budget (OMB). Notwithstanding the absence of a requirement, non-business-type activities may elect to recognize imputed cost and corresponding imputed financing for other types of inter-entity costs.

¹ Business-type activity is defined as a significantly self-sustaining activity that finances its continuing cycle of operations through collection of exchange revenue as defined in SFFAS 7, *Accounting for Revenue and Other Financing Sources and Concepts for Reconciling Budgetary and Financial Accounting*.

RESCISSION OF TR 8, *CLARIFICATION OF STANDARDS RELATING TO INTER-ENTITY COSTS*

- A5. This TR rescinds TR 8 because it is no longer consistent with SFFAS 4, as amended.
- A6. Rescinding TR 8 rescinds guidance that is not in accordance with generally accepted accounting principles (GAAP) due to SFFAS 55 amendments. For example, TR 8 does not reflect that recognition of inter-entity costs by activities that are not business-type activities is not required with the exception of inter-entity costs for personnel benefits and the Treasury Judgment Fund settlements unless otherwise directed by OMB. However, non-business-type activities may elect to recognize imputed cost and corresponding imputed financing for other types of inter-entity costs.
- A7. This TR also eliminates potentially confusing references to the rescinded SFFAS 30. The Accounting and Auditing Policy Committee (AAPC or “the Committee”) believes it appropriate to rescind TR 8 because allowing it to remain is inconsistent with current GAAP and may lead to potential misapplication of the technical guidance. For example, paragraph 7 (the first paragraph under the “Technical Guidance” section) of TR 8 states: “This guidance is presented in response to three implementation issues identified by FASAB based on comments SFFAS 30 received from respondents.” With SFFAS 30 being rescinded, allowing TR 8 to remain in effect could bring questions as to its applicability.
- A8. Considering the changes that have occurred in the accounting for inter-entity costs, the Committee’s goal was to update TR 8 to ensure clear guidance going forward. The Committee carefully considered if any guidance should be maintained and if any additional guidance was necessary. Paragraph 111 of SFFAS 4, as amended, states:
- Recognition of all significant inter-entity costs is important when those costs constitute inputs to government goods or services provided for a fee or user charge. Generally, the fees and user charges should recover the full costs of those goods and services. ^[Footnote 33 omitted] Thus, the cost of inter-entity goods or services needs to be recognized by the receiving entity in order to determine fees or user charges for goods and services sold by the federal government. Recognition of inter-entity costs supporting business-type activities ^[Footnote 33A omitted] and recognition of inter-entity costs for non-business type activities that elect to do so should be made in accordance with implementation guidance provided by FASAB through one or more Technical Releases. ^{33B} Activities that are not business-type activities are not required to recognize inter-entity costs other than inter-entity costs for personnel benefits and the Treasury Judgment Fund settlements unless otherwise directed by OMB. Notwithstanding the absence of a requirement, non-business-type activities may elect to recognize imputed cost and corresponding imputed financing for other types of inter-entity costs.
- ^{33B} Technical Release (TR) 8, *Clarification of Standards Relating to Inter-Entity Costs* provides implementation guidance. Additional TRs may be provided by FASAB if needed.
- A9. The Committee believes that much of the guidance that was previously included in TR 8 is no longer necessary or relevant based on the amended standards. The purpose of TR 8 was to provide guidance in response to concerns raised during due process of SFFAS 30. TR 8 addresses three aspects of full costing specified in SFFAS 4: (1) guidance on

costs that should be considered broad and general for all entities, (2) guidance on the directness of the relationship to the entity's operations as used in determining if a transaction should be considered material to the receiving entity, and (3) guidance on identifiability as used in determining if a transaction should be considered material to the receiving entity.

- A10. The Committee determined that the list of broad and general support goods and services that was provided in table 1 of TR 8 is not necessary to maintain. While the list was helpful to the community when TR 8 was issued in 2008, the Committee believes the conclusions presented in the list are now well established and do not need to be included in any form of updated guidance. Table 1 provided the following examples, which appear to be widely understood in the community today as broad and general support goods and services:
- a. Department of the Treasury services, such as disbursing electronic funds transfer and check payments, government-wide accounting and reporting policy and guidance, collection services, and trust fund maintenance
 - b. Department of Justice services, such as debt collection activities and non-reimbursed services for criminal and civil litigation
 - c. General Services Administration services, such as real and personal property disposal and central management functions
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- A11. When considering the need for guidance on the directness of a relationship to an entity's operations, TR 8 included specific excerpts from respondents to SFFAS 30, which has now been rescinded. In addition, the guidance included excerpts from SFFAS 4 as well as paraphrases from the "Managerial Cost Accounting Concepts" and "Basis for Conclusions" sections that reiterated key points. While important, the Committee determined the following TR 8 topics discussed key points that reside in SFFAS 4, as amended, and do not need to be included in any form of updated guidance:
- a. The directness of the relationship to entity operations is generally determined by matching goods or services received to the output of the entity.
 - b. Managerial cost accounting should be performed to measure and report the costs of each responsibility segment level's output.
 - c. The needs of the users of cost information must be taken into account.
- A12. The Committee found that the majority of the explanations on identifiability included direct excerpts and paraphrases from the "Managerial Cost Accounting Concepts" and

“Basis for Conclusions” sections from SFFAS 4. The guidance in TR 8 related to the requirement for the provider to supply the receiving entity with information on the full cost of non-reimbursed or under-reimbursed inter-entity goods and services. The Committee believes this requirement and the requirements when information is not provided are well understood by the community. Therefore, this does not need to be included in any form of updated guidance.

- A13. In summary, the Committee believes that, while the guidance was useful during initial implementation of SFFAS 30, it is not necessary today. Much of the guidance provided in TR 8 is now understood by the community. Further, portions of TR 8 reiterated key points from SFFAS 4 and quoted it directly. Other portions of TR 8 contained paraphrases from the “Managerial Cost Accounting Concepts” and “Basis for Conclusions” sections of SFFAS 4 that are still included within SFFAS 4. For example, including excerpts from SFFAS 4 (issued in 1995) is not practical or useful considering SFFAS 4 is available for reference. The Committee believes all necessary guidance resides in SFFAS 4, as amended.

SUMMARY OF OUTREACH EFFORTS AND RESPONSES

- A14. The exposure draft (ED), *Rescission of Technical Release 8*, was issued August 21, 2018, with comments requested by October 5, 2018.
- A15. Upon release of the ED, FASAB provided notices and press releases to the FASAB subscription email list, the Federal Register, *FASAB News*, the *Journal of Accountancy*, Association of Government Accountants Topics, the *CPA Journal*, *Government Executive*, the *CPA Letter*, the Chief Financial Officers Council, the Council of the Inspectors General on Integrity and Efficiency, and committees of professional associations generally commenting on EDs in the past (for example, the Greater Washington Society of CPAs and the Association of Government Accountants Financial Management Standards Board).
- A16. The AAPC received nine responses from preparers, users of federal financial information, and professional associations. All respondents agreed with the proposals provided in the TR.
- A17. The AAPC considered responses to the ED at its November 27, 2018, public meeting. The AAPC did not rely on the number in favor of or opposed to a given position. Information about the respondents’ majority view is provided only as a means of summarizing the comments. The AAPC considered the arguments in each response and weighed the merits of the points raised.
- A18. All respondents supported the proposal to rescind TR 8, *Clarification of Standards Relating to Inter-Entity Costs*, because it is no longer consistent with SFFAS 4, as amended.

AAPC & BOARD APPROVAL

- A19. The TR was approved by the AAPC for release to FASAB for issuance. [TBD-The Board has reviewed this TR and a majority of its members do not object to its issuance.]
Written ballots are available for public inspection at the FASAB office.

APPENDIX B: ABBREVIATIONS

AAPC	Accounting and Auditing Policy Committee
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OMB	Office of Management and Budget
SFFAS	Statement of Federal Financial Accounting Standards
TR	Technical Release

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Federal Accounting Standards Advisory Board

Date: November 5, 2018

To: Members of the AAPC

From: Wendy M. Payne, Executive Director

Subject: **Ballot for Draft Federal Financial Accounting Technical Release 19,
*Rescission of Technical Release 8***

The following is a ballot for the Draft Federal Financial Accounting Technical Release 19, *Rescission of Technical Release 8*. Please enter your name in the space provided below and indicate your approval or disapproval. Please fax the ballot to us at 202 512-7366. If you wish to submit your ballot via e-mail, please e-mail to Melissa Batchelor at batchelorm@fasab.gov.

Ballots are due by November 27, 2018. If you wish to dissent, please notify staff immediately and provide the text of your dissent as soon as possible but no later than November 14, 2018. We will assume members not voting by the December 3, 2018 are abstained. If seven members approve the technical release, we will finalize the release on December 6, 2018 and submit it to FASAB members for review.

Committee Member: _____ Date _____

_____ I approve the Draft Federal Financial Accounting Technical Release

_____ I do not approve the Draft Federal Financial Accounting Technical Release